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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20544

In the Matter of)

1998 Biennial Regulatory Review --)
Amendment of Part 18 of the)
Commission's Rules to Update)
Regulations for RF Lighting Devices)

ET Docket No. 98-42

COMMENTS OF AIRONET WIRELESS COMMUNICATIONS, INC.

Aironet Wireless Communications, Inc. respectfully submits the following comments in response to the Commission's Notice of Proposed Rulemaking for Part 18 Devices per ET Docket 98042 / FCC 98-53 Adopted April 9, 1998.

This addresses the concerns on the proposed changes to Part 18 as requested by Fusion Lighting. As a maker of part 15 unlicensed devices that operate in the 2450 MHz band, we believe any relaxation of the conducted or radiated limits would increase possible interference to low power radio devices operating under Part 15 rules at this frequency. Fusion argues that designing and installing a filter to reduce conducted emissions and be UL compliant would increase the overall cost of the device. This same problem has been addressed by numerous manufacturers of electronic devices who have also incurred expenses in designing filters to meet the FCC Part 15.109 or Part 18.307, we believe that the there should be no special exemption for the Part 18 line conducted rules.

Since the radiated emissions for Part 18 were based on an earlier version of the Part 15 rules, we support the commission in updating the Part 18 radiated rules to reflect the

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requirements of the current Part 15.109 which include the radiated limits for emissions above 1 GHz.

These new lighting devices operating at 2450 MHz are designed for use in warehouses, commercial facilities, and shopping malls. These types of facilities are also some of the prime areas for usage of Part 15.247 spread spectrum devices. Currently there is no in-band (2400 – 2500MHz) RF radiated limit requirement for Part 18 RF lighting devices. This issue needs to be addressed by the Commission. With a potential for increased use of these types of lighting devices, the potential for RF interference for wireless devices operating in the 2.4 GHz band will be greatly increased. It is our belief that with the current changes in technology, the Commission needs to address and define a requirement for RF levels for this type of lighting device operating in the 2450 MHz band to avoid any interference problems.

Respectfully,

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